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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, ) NO. CR 15-00051-JST  
Plaintiff, )  
v. ) STIPULATION AND [PROPOSED] ORDER  
THANH P. TRUONG and ) CONTINUING HEARING DATE AND  
JEFFREY MENIES, ) EXCLUDING TIME FROM SEPTEMBER 18, 2015  
Defendants. ) TO OCTOBER 23, 2015

The defendants, Thanh P. Truong, represented by Angela Hansen, and Jeffrey Mennies, represented by Garrick S. Lew, and the government, represented by Scott D. Joiner, Assistant United States Attorney, hereby stipulate and agree as follows:

1. The Court notified the parties that it is unavailable for the status conference currently scheduled for September 18, 2015, and provided later dates of availability, which include October 23, 2015.

2. The parties have conferred and agree that October 23, 2015, is the best available date given the respective schedules of counsel and ongoing discovery.

3. The parties therefore jointly request that the Court continue the September 18, 2015,

status conference until October 23, 2015, at 8:30 AM.

4. The Court previously excluded time under the Speedy Trial Act through and including September 18, 2015, for the effective preparation of counsel.

5. The parties agree that in light of ongoing discovery, it remains appropriate to exclude time under the Speedy Trial Act for effective preparation of counsel through and including the date of the newly requested hearing date of October 23, 2015.

## **SO STIPULATED.**

Date: September 14, 2015

**BRIAN J. STRETCH**  
Acting United States Attorney

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/s/  
SCOTT D. JOINER  
Assistant United States Attorney

Date: September 14, 2015

/s/  
ANGELA HANSEN  
Attorney for Thanh. P. Truong

Date: September 14, 2015

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/s/  
GARRICK S. LEW  
Attorney for Jeffrey Mennies

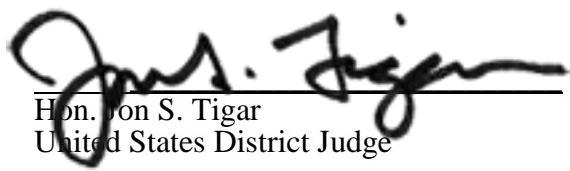
1                   **[PROPOSED] ORDER**

2                   Pursuant to stipulation, IT IS HEREBY ORDERED that the court proceeding currently  
3 scheduled on September 18, 2015, at 9:30 a.m., be continued to October 23, 2015, at 8:30 a.m.

4                   Based upon the representation of counsel and for good cause shown, the Court finds that failing  
5 to exclude the time between September 18, 2015, and October 23, 2015, would unreasonably deny the  
6 defendant continuity of counsel and would deny counsel the reasonable time necessary for effective  
7 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The  
8 Court further finds that the ends of justice served by excluding the time between September 18, 2015,  
9 and October 23, 2015, from computation under the Speedy Trial Act outweigh the best interests of the  
10 public and the defendant in a speedy trial.

11                  Therefore, IT IS HEREBY ORDERED that the time between September 18, 2015 through and  
12 including October 23, 2015, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C.  
13 § 3161(h)(7)(A) and (B)(iv).

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16 DATED: September 14, 2015 \_\_\_\_\_

  
Hon. Jon S. Tigar  
United States District Judge